EXHIBIT 3

MILBERG TADLER PHILLIPS GROSSMAN LLP   NEW YORK

Peggy J. Wedgworth
Direct Dial: (646) 515-1269
pwedgworth@milberg.com

July 12, 2018

VIA EMAIL

Matthew Provance, Esq.
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
MProvance@mayerbrown.com

      Re: *In re Dealer Management Systems Antitrust Litig.*,
                  MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Matt:

It has come to our attention that of the 681 documents you are now attempting to claw back, pursuant to your letter of June 21, 2018, over 470 of those documents were withheld from Dealership Class Plaintiffs, yet were previously produced to the government, Authenticom, or both (two separate bates numbers on each page).

In order for everyone to prepare for the meet and confer, please respond to the following:

- Why were the over 470 proposed clawback documents not produced to Dealership Class Plaintiffs?

- In your June 21, 2018 letter, you stated that "we confirm that the FTC…has been asked to destroy or return" the clawed back documents.

  -When did such request occur? Which of the 681 documents in Schedule A did you request the FTC destroy or return?

  -When did you first notify the FTC of *any* request to destroy or return any documents?

One Pennsylvania Plaza 19th Floor ● New York, NY 10119 ● 212.594.5300 ● F 212.868.1229 ● www.milberg.com

Matthew D. Provance
July 12, 2018
Page 2

-Please indicate the total number of documents and their bates numbers you requested the FTC destroy or return. If you have requested that the FTC destroy or return any documents in addition to those listed in Schedule A, please indicate the total number of these documents and their bates numbers, and the date(s) such request(s) occurred.

-Please provide any communications (including but not limited to emails and letters) with the FTC where you request they destroy or return any documents you have attempted to claw back, including those identified in your June 21 letter.

- What is your understanding as to what, if any, action the FTC has taken regarding your request(s), and the basis for this understanding?

Sincerely,

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth

MILBERG TADLER PHILLIPS GROSSMAN LLP